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BY FAX

Judge Barbara S. Jones
United States District Court
500 Pearl Street--Room 610
New York, New York 10007

DISQUALIFICATION OF DEFENDANTS' COUNSEL

Re: Leslie Dick Worldwide, Ltd. et al. v. George Soros, et al.;
Case No. 08 Civ. 7900 (BSJ) ECF

Dear Judge Jones:

I am writing to you in furtherance of the issues raised by my letter of October 14, 2008, another copy of which is enclosed. It is clear from appearances of counsel in this action that my concern expressed in my previous letter has materialized: the RICO Enterprise is attempting to cover up the activities alleged in the complaint by hiring counsel *who participated and facilitated the very same criminal activities alleged in the complaint and, in some cases, who are named as defendant conspirators themselves.*

As I pointed out in my letter, Willkie Farr had a direct relationship with at least two of the other defendants in this action, Fortress and Cerberus, in connection with the activities alleged in the complaint to be acts of money laundering and bankruptcy fraud.¹ The Complaint alleges that it was Soros who masterminded these criminal acts and directed the activities of Fortress and Cerberus. Thus, it is wholly improper that Willkie Farr represent Soros in this action. (Indeed, this conduct further supports the allegations in the complaint that Cerberus and Fortress were indeed fronts and co-conspirators for Soros' criminal activities.)

¹ See footnote two in my October 14, 2008 letter and the exhibits thereto.

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Also, as I previously stated in my letter on page 2, Willkie Farr's representation of Soros and Soros Fund Management ("Soros") violates NY Disciplinary Rule 5-102 (b) [§1200.21] (Lawyer as a Witness) since Willkie Farr will certainly be called as a witness, and may indeed be an additional defendant in this action.

In addition, as I pointed out previously, Willkie Farr's website indicates that at various times it represented *and continues to represent* defendants Soros, Trump, Macklowe, Fortress, Deutsche Bank, Lazard and Cerberus—all defendants in this action. Thus, Willkie Farr has demonstrable conflicts which prevent it from representing Soros, the mastermind of the money laundering and bankruptcy fraud claims, and for that matter, any other defendant in this action.

Willkie Farr is not the only firm with such serious conflicts. Sullivan & Cromwell, which has appeared for defendant Vornado Realty Trust, represented Soros Fund Management in connection with "its equity financing of the \$1.4 Billion acquisition of the GM Building." (See printout from Sullivan & Cromwell's website attached hereto.) Vornado supplied the mezzanine financing in conjunction with the acquisition of the GM Building by Macklowe (Soros), and, according to the complaint, funneled money from Soros thru Vornado to other ephemeral entities as part of the illegal money laundering scheme. (See enclosed copy of Exhibit "LL" to the Compendium of Exhibits.)

Also, as I previously pointed out in my letter: "Kirkland & Ellis is a defendant in this action and its letter makes very clear that it has personal knowledge of the transactions at issue. Thus, Kirkland & Ellis, a defendant in this action, violates DR 5-101 [1200.20] (Conflict of Interest; Lawyer's Own Interest) and DR 5-102 [1200.21] (Lawyer as a Witness) by claiming to represent two other defendants whom it represented in the Conseco Bankruptcy: Conseco, Inc. and Carmel Fifth, LLC." Kirkland & Ellis has now filed a Notice of Appearance representing itself—an alleged conspirator in the criminal activities—and *Conseco and Carmel Fifth*, alleged co-conspirators with Kirkland & Ellis. Moreover, as you are aware, Kirkland & Ellis was present at the opening of the bids at the sham auction which violated Sheldon Solow's right to a fair and honest auction, as, indeed it also did to my client, who was the winning bidder on both the first and second bids.

Similarly, the representation by Fried Frank of itself and its alleged co-conspirator, Harry Macklowe, is impermissible. Moreover, Fried Frank represented the Unsecured Creditors in the Conseco Bankruptcy proceeding, who were defrauded by Fried Frank and Macklowe when they closed on the transaction on the GM Building which is one of the central acts of money laundering and Sherman Anti-Trust violations.

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As demonstrated in the complaint, Soros has a *modus operandi* of using people and institutions, knowingly or unknowingly, to achieve his Machiavellian result. In the instant case, not only are all the lawyers and defendants continuing the RICO Enterprise by continuing the conspiracy, but Soros has obviously further exacerbated this situation by hiring Mr. Romano of Willkie Farr to represent him and Soros Fund Management.²

In light of the fact that Your Honor has scheduled December 22, 2008 for the defendants to answer the complaint—at which point all the parties and their counsel will have arrived at what will certainly be the continuation of their collusive strategies—I request a conference to resolve this situation *in the event that defendants do not immediately notify this Court that they intend to retain new counsel*.

In the alternative, now that I have revealed the clear impropriety of counsels' retention, to avoid severe prejudice to plaintiffs' interests, I request Your Honor to allow plaintiffs to make motions to disqualify counsel prior to any response to the Complaint by defendants.

Respectfully submitted,

s/ *David H. Relkin*

David H. Relkin

DHR\mw
Enclosure
cc: All appearing counsel

² Mr. Soros is obviously attempting to trade on the fact that both Your Honor and Mr. Romano simultaneously served in supervisory positions in the US Attorney's Office for the Southern District of New York.